

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE TWO HUNDRED FIFTIETH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO TO INDIVIDUAL PROOF OF CLAIM NO. 2528**

To the Honorable United States District Judge Laura Taylor Swain:

1. On September 11, 2020, the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed the *Two Hundred Fiftieth Omnibus Objection (Non-Substantive) of the*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Commonwealth of Puerto Rico to Satisfied Claims [ECF No. 14222] (the “Two Hundred Fiftieth Omnibus Objection”) to various proofs of claim.

2. The Two Hundred Fiftieth Omnibus Objection seeks to disallow certain claims which have been fully satisfied (the “Satisfied Claims”), each as listed on Exhibit A thereto. As set forth in the Two Hundred Fiftieth Omnibus Objection, each of the Satisfied Claims purports to assert liability against the Commonwealth based on an allegedly unpaid tax refund or an allegedly unpaid invoice, but the records of the Commonwealth’s component agencies indicate that each of the alleged liabilities has already been paid in full.

3. The Commonwealth received the attached correspondence from Sheila Garrastegui Maldonado (“Garrastegui Maldonado”), a copy of which is attached hereto as Exhibit “A” (the “Garrastegui Maldonado Response”), regarding Proof of Claim No. 2528 (the “Garrastegui Maldonado Claim”). A certified translation of the Garrastegui Maldonado Response is attached hereto as Exhibit “A-1.”

4. The Garrastegui Maldonado Response acknowledges that the Garrastegui Maldonado Claim “was satisfied,” and does not object to the disallowance of the Garrastegui Maldonado Claim. Additionally, the Garrastegui Maldonado Response contains information regarding Garrastegui Maldonado’s current mailing address. Accordingly, because the Garrastegui Maldonado Response does not contest the relief the Commonwealth seeks, the Commonwealth respectfully requests that the Court grant the Two Hundred Fiftieth Omnibus Objection and disallow the Garrastegui Maldonado Claim, notwithstanding the Garrastegui Maldonado Response.

Dated: January 4, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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